

## Inventure Compliance Information Sheet

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### Inventure funds being supported by the European Union



Inventure Funds are supported by the European Union. Fund I and II are supported through the “Competitiveness and Innovation Framework Programme” (CIP), and Fund III by EIF and the EIB with the backing of the “European Fund for Strategic Investments (EFSI)”.

### Inventure as a member of FVCA

Inventure is a proud member of the Finnish Venture Capital Association ([FVCA](#)). Inventure adheres to FVCA's guidelines to promote transparency in venture capital. We like to be the dependable investor, and transparency and honest feedback are the cornerstones of our approach.

When we screen companies and make investment decisions, we always seek transparency. Transparency from the entrepreneurs and transparency from our side in giving feedback to the startups raising funding. In summary, we like clear, simple and direct communication. When it comes to reporting and compliance, we apply the same principles.

The FVCA has issued a specific set of guidelines that promote transparency in venture capital and private equity industries. Inventure meets these requirements. To read the associations recommendations, please find them [here](#). Further down in this form, you will find more insights on how Inventure operates and follows the Association's guidelines.

## Our SFDR principles

The partnerships are constantly carefully managed and ESG risks taken into consideration in making investment decisions. If you want to read more, you can always find Inventure's [ESG & Responsible Investment Policy on our website](#).

When it comes to SFDR, for the time being Inventure Funds (Onventure Oy) do not consider adverse impacts of investment decisions on sustainability factors as meant in Article 4(1) of the EU Regulation 2019/2088 on sustainability-related disclosures in the financial services sector ("**SFDR**") due to the following reasons:

- The more detailed requirements relating to the consideration of adverse impacts of investments decisions on sustainability factors are still rather unclear due to the related regulatory incompleteness.
- Considering that the portfolios of the managed funds consist of a number of minority investments in unlisted companies, it is not certain whether all data can be obtained with respect to each portfolio company.
- Onventure's approach is to tackle the ESG & sustainability topic in each portfolio company as per *their specific* situation. We search and gain this knowledge by holding board positions in the companies we invest in, and by conducting a yearly ESG survey among them. When we find out and know what is each company going through, we believe we can also help the companies the most, and therefore also gain the biggest positive effect on sustainability and responsibility.

Once there are more detailed regulations regarding measuring, considering and reporting adverse impacts on sustainability factors, Onventure Oy intends to reconsider its approach to the foregoing.

## *SFDR & further remarks*

Because Onventure Oy is a registered AIFM, it has no obligation to draw up a remuneration policy, so the topic of remuneration has neither been taken into account when considering sustainability risks.

Correspondingly, Onventure Oy is not obliged to publish an annual report (vuosikertomus) that would inform about harmful effects on sustainability factors.

## Our Code of Conduct

Inventure commits to diversity and anti-harassment and wants to support the development of such values also within the local VC and startup ecosystem. We recognize that the industry we work in still shows biased statistics when it comes to diversity.

We expect everyone associated with Inventure to abide by this code of conduct, including employees, founders, investors and attendees of our events. This applies to all of these people in any setting associated with Inventure. Unacceptable behavior includes but is not limited to:

- Discrimination against stereotypes, or harming members of marginalised groups (including comments and behavior),
- Sexual harassment including any unwanted, unwelcome or uninvited behaviour of sexual nature, which a reasonable person in the circumstances would find humiliating, intimidating or offensive,

– Advocating for or supporting any unacceptable behaviour

We strongly encourage everyone to report any violations of this code of conduct in writing to Inventure via [our whistleblowing platform](#), found on our website.

For further details, please refer to our [full code of conduct](#).

## Our whistleblowing platform

In addition to any violations to Inventure Code of Conduct (see above), you may also report any other problems or violations you face when working with us on within our community. Please use the [whistleblowing form](#) to report of e.g. bribery, corruption, money laundering, discrimination or harassment. You can remain anonymous by choosing not to reveal your name. If you choose to remain anonymous, please note that Inventure will be unable to contact you for further investigation or help with the matter at hand. All data is treated confidentially. Please note that you may also contact any one of us directly by phone / email (contact information on Inventure website). Thank you for taking this necessary step towards a better startup and VC ecosystem!

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## Information on how Inventure operates, following FVCA's transparency guidelines

### **Who owns Inventure and who manages it?**

Inventure funds (Fund Ky, Fund II Ky, Fund III Ky and Fund IV Ky) are the partnerships, the General Partners of which are Inventure Oy, Inventure II Oy, Inventure III Oy and Inventure IV Oy respectively. The General Partners in turn are owned by Onventure Oy and Onventure Oy has been appointed to operate and manage the partnerships.

Onventure Oy is owned by partners Sami Lampinen, Timo Tirkkonen, Tuomas Kosonen, Linus Dahg, Ekaterina Gianelli and Lauri Kokkila. You can read more about them on the team page of Inventure website.

### **Who should be contacted for a media inquiry?**

We like to be approachable. That's why you will always find our email address and phone numbers on the website (spam in moderation). Sami Lampinen and Greg Anderson are the best people to contact for any media inquiry, you can find their details on our team page.

### **How many funds has Inventure raised? How big are they?**

The company was first founded in 2005 and is currently deploying four funds. The first closing of Inventure Fund IV Ky took place in January 2022, and amounted to 105 M€. We also have three more funds under management: Inventure Fund Ky, opened in 2008 with 40 M€ under management, Inventure Fund II Ky, opened in 2013, with 70 M€ under management, and Inventure Fund III Ky, opened in 2017, with 117 M€ under management.

### **Who are the investors behind Inventure funds?**

Funds III and IV are the actively investing funds of Inventure. Their investors can be classified as follows (per committed capital in the fund):

Fund III's investors can be classified as follows (per committed capital in the fund):

Holding companies: 9%

Public sector: 63% (EIF, TESI etc.)

Pension companies: 16%

Other insurance sector: 8%

Fund of funds: 4%

Geographically, they are distributed as follows:

Finland: 64%

Elsewhere in Europe: 36%

Fund IV's investor list will be disclosed when the final closing has been done.

## **Who have you invested in?**

Our investment strategy is based on key learnings from previous funds. We focus on Nordic and European seed and A rounds, operating with what we call “an evolution-based strategy”, meaning that majority of capital is invested as add-on investments. Our investment thesis in Fund IV is revolved around six main themes we believe will shape the world of tomorrow: i) Sustainable resources, new energy, energy efficiency, ii) Blockchain, financial inclusion, new era of banking, iii) Cybersecurity, data structure, privacy, AI & IoT, iv) Modernization of health care, v) Consumer fairness, new digital platforms, and vi) Enabling tech, new materials.

To date, we have a pretty interesting portfolio (or at least we like to think so). Check it out on [our portfolio page](#).

## **Investing is easy, growth is hard. How do you properly value growth companies?**

We are supported by EIF and follow the Invest Europe guidelines for valuation principles.

## **How do you report those information to the limited partners?**

We provide all our investors with quarterly reports and arrange yearly AGM meetings. Furthermore, specific meetings are held with the Advisory Board members of our funds, typically twice a year.

## **What about your exits? Anything interesting to show us?**

You can find more information on our divestments in the portfolio page.

## **Do you consider yourself a responsible investor?**

Inventure (Onventure Oy) is a member of the international [Invest Europe](#) organisation as well as member of the Finnish Venture Capital Association (FVCA). We comply with the rules and recommendations of the organisations (see above). We are also a member of Finland's Sustainable Investment Forum ([Finsif](#)).

But of course that's not all there is to it. We always follow good ESG & responsible investment criteria and ethics when investing, when working with and in the boards of portfolio companies we have invested in, and when selling them. Please find our ESG & responsible investment policy on our website to read more. Furthermore, we conduct a yearly ESG survey among our portfolio companies. With the survey we aim to monitor the (ESG) development of our investees, and find out what are the most urgent topics the companies need help with. We are in a good position to affect things, since we almost always take a board position in the companies we invest in. By being close to the founders and management team, we can act as responsible investors who know what's going on and where help is needed.

### **What about AIFM license? Are you fully licensed or registered?**

Inventure (Onventure Oy) is a registered AIFM and an EuVECA manager.